

## TCLP/SPLP MDL Resolution

On July 17, 2004 the Director of NELAP notified the Accrediting Authority Workgroup, NELAP Assessors, and Mr. Barry Lesnik, Office of Solid Waste, that the Florida Department of Health, as the NELAP Accrediting Authority, and STL-Knoxville, as a NELAP Recognized laboratory, invoked Section A.2.2 of Appendix A, Chapter 6 of the applicable 2003 NELAC Standard titled "Decision/Interpretation Procedure When Affected Parties Cannot Reach an Agreement". All parties participated in a conference call on July 22, 2004. The Accrediting Authority Workgroup, NELAP Assessors, Mr. Lesnik discussed the information provided by Florida and STL and interpreted the issue as follows:

The Toxicity Characteristic Leaching Procedure/Synthetic Precipitation Leaching Procedure (TCLP/SPLP, SW-846 1311/1312) is not a part of the analytical procedure, and as such is not included in the determination of detection limits. TCLP/SPLP is a procedure to make the sample. The intent of these methods is to leach analytes from a matrix, not to quantitatively extract all target analytes from a sample. As such, it would be inappropriate to spike samples before the leachate procedure. Leachates should be spiked after filtration of the samples and before preservation.

TCLP simulates a leaching process and is not a complete quantitative extraction of the target constituents from the waste sample. The generation of the leachate is defined by the method and the method requires matrix spikes to be added after filtration of the TCLP extract. The leachate does not extract all of the substrate and will vary with each sample matrix. The rate of migration and amount of extract will depend on the substrate, particle size, pH, moisture content and presence of organic acids. TCLP/SPLP extracts should be thought of as a "sample" and not included in the determination of detection limit. Therefore, the standards of Appendix D.1.2 to NELAC Chapter 5 are not applicable to TCLP/SPLP.